UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO, a/k/a CHILLE DeCASTRO, a/k/a DELETE LAWZ,

Plaintiff,

v.

CASE NO. 1:22-cv-11421-ADB

JOSHUA ABRAMS a/k/a ACCOUNTABILITY FOR ALL, KATE PETER a/k/a MASSHOLE TROLL MAFIA,

Defendants.

AFFIDAVIT OF JOSHUA ABRAMS A/K/A ACCOUNTABILITY FOR ALL

- I, Joshua Abrams a/k/a Accountability for All, under oath depose and state as follows based upon my personal knowledge:
- I am one of the Defendants in the above-captioned matter. I run a YouTube channel entitled "Accountability for All."
- 2. Approximately eight (8) months ago, I first met and began speaking with Plaintiff, Jose DeCastro. Around that time, I began moderating some of Mr. DeCastro's YouTube livestream sessions by posting links, screening comments and chats, etc.
- 3. I know Defendant, Kate Peter, from her YouTube channel, "Masshole Troll Mafia." While my relationship with Ms. Peter has been tumultuous at times, I have maintained a line of direct communication with her.
- 4. Around the time I began to work with Mr. DeCastro, Ms. Peter's interest in Mr. DeCastro became piqued. She began to post about Mr. DeCastro on her YouTube channel.

- 5. Mr. DeCastro once asked me if I had a way to directly reach Ms. Peter because he did not. I said I had a direct means to communicate with Ms. Peter via Facebook Messenger.

 Mr. DeCastro thereafter sent me a copy/pasted "cease and desist" communication and asked that I send it to Ms. Peter. On or about April 26, 2022, I sent this "cease and desist" communication to Ms. Peter via Facebook Messenger on Mr. DeCastro's behalf.
- 6. Attached hereto as **Exhibit A** is a true and correct copy of that Facebook message.
- 7. In that message, Mr. DeCastro admitted that he would file vexatious litigation ("I don't care if I win ... I care that you have to hire a lawyer ... I care that I extend the process for as long as I can do drain you") if statements relating to Mr. DeCastro were not retracted. *Id*.
 - 8. I would soon become the recipient of similar threats made by Mr. DeCastro.
- 9. Mr. DeCastro and I had a falling out and I was eventually named as a defendant in this lawsuit. The statements he has made all show that this case is not designed to win on the merits, but is instead brought with vexatious and abusive motives.
- 10. For example, when Mr. DeCastro informed me that he had requested a default judgment (a request that has since been denied by the Court), he wrote: "This is just beginning -- You made a grave error in choosing to tangle with me. Heed my warning: I will not stop until I break you down to zero. We Don't Stop."
 - 11. Attached hereto as **Exhibit B** is a true and correct copy of that e-mail message.
- 12. In a video, Mr. DeCastro states (of myself and Ms. Peter): "eventually I'm gonna get 'em because the thing is, is that I will break them financially they will have to hire a lawyer. I will file motion after motion after ... and I'll just keep going legally after them until I break 'em. Until they can't afford to hire a lawyer anymore 'till they run out of money. That's what

I'm gonna do. I'm gonna break them." A true and correct copy of this video can be viewed at: https://youtu.be/XX-is5kJ6zQ?t=722.

- 13. To further his coercive goals, Mr. DeCastro has resorted to threats of physical violence. In another video, Mr. DeCastro also said: "Josh, if you are ever in my presence, my fried, you better hope there's cameras on. You better pray there is and there is someone to stop me." A true and correct copy of this video can be viewed at: https://youtu.be/M20pucR0uSc. The relevant statement begins at the 1:56:54 timestamp.
- 14. Mr. DeCastro's violence is a real threat. At one point in time, prior to our falling out, he appeared at my house as an invited guest. He told me he was carrying two firearms, a shotgun and a handgun revolver, without a valid license to carry these weapons. I immediately kicked him out and would not let him in my house.
- 15. Aside from financial coercion and threats of physical harm, Mr. DeCastro also uses blackmail and extortion to get his way.
- 16. For example, I had recorded video of him physically harming Ms. Peter. That video was posted to a Youtube channel I control. When Mr. DeCastro learned of the video, he demanded that I take the video down. He threatened me with litigation and also blackmailed me by claiming he would contact my parole officer to falsely claim that I had been consuming drugs while on parole. When I informed him that I had not violated the terms of my parole, he said that it would not matter because just by informing them, the parole officer will put me through an onerous process of proving my innocence and that I could be incarcerated while that process unfolded.

Signed under the penalties of perjury on this 20th day of October 2022.

/s/ Joshua Abrams

Joshua Abrams a/k/a Accountability for All